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10/9/96

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OCT 10 1996
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Mr. William F. Caton, Secretary
Federal Communications Commission
Room 222
1919 M Street, NW
Washington, DC 20554

Re: CC Docket No. 92-105

Dear Mr. Caton:

I enclose an original and nine copies of Comments with attachments for filing in Common Carrier Bureau Docket 92-105 in support of the request of the United States Department of Justice that 311 be reserved for use by communities for non-emergency police telephone calls. The attachments to these comments include statements of representatives of the City of Sacramento also in support of the 311 designation. I recommend these attached statements to the Commission as evidence of the importance of this docket.

Thank you for your consideration of all these Comments. If you have any questions or comments regarding the enclosed, please contact me.

Sincerely,


Janice F. Hill

enc.

cc: Councilmember Waters, Sacramento City Council
Mr. Jack Crist, Deputy City Manager
Mr. Arturo Venegas, Jr., Chief, Sacramento Police Department

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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OCT 10 1996
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In re)
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Request of the United States Department)
of Justice that 311 be reserved for use by) CC Docket No. 92-105
Communities for Non-emergency Police)
Telephone Calls)

To: Secretary, FCC

DOCKET FILE COPY ORIGINAL

COMMENTS OF JANICE F. HILL¹

I submit these comments to the Federal Communications Commission (FCC) in support of the proposal of the US Department of Justice, Office of Community Oriented Policing Service that the FCC develop 311 as a universal non-emergency telephone number for contacting local police. The Sacramento area would greatly benefit from the establishment of the non-emergency number proposed by the Justice Department in their August 26, 1996 letter to the Chief of the Common Carrier Bureau.

The 311 designation is an elegant solution to a problem which is growing -- the misuse of the emergency 911 system. Even if the issue were simply one of more efficient use of limited 911 resources, the request should be granted. But this issue is more important than just efficient use of public resources; the problems created by an overburdened 911 system can have life and death consequences to the public who rely upon timely receipt of critical emergency services. The proposed 311 non-emergency designation could readily relieve much of this burden.

Further, given the complex geographic/political boundaries of some communities, especially the Sacramento area, it is sometimes difficult for individuals to determine which non-emergency number to call. The uniformity in

¹ A Sacramento resident since 1989, I submit these comments as a user of the local 911 system and the non-emergency police numbers in this area. Also attached are statements of representatives of the City of Sacramento: Councilmember Robbie Waters, Deputy City Manager, Jack Crist and under separate filing Chief of Police, Arturo Venegas, Jr.

having a easily remembered number which is consistent would be particularly helpful to the citizens of this area, or any area with jagged jurisdictional borders.

According to a recent report in a local newspaper,² the use of the 911 emergency system in the Sacramento area has increased dramatically over the past ten years, at a much higher rate than the population increase in this area would justify. The population in Sacramento County has increased by 14% between 1989 and 1995, yet the number of 911 calls during this period increased by 78%. In the City of Sacramento the population increase was 25%, but the increase in 911 calls was 95%.

The problem is not just the increase in 911 calls, but also the high percentage of non-emergency calls coming through the 911 system. For example, in the Sacramento area local officials estimate that at least half--and as many as 80 percent --of the calls made to 911 are not true emergencies.³ This invariably translates into a longer waiting period for some of the callers with true emergencies who need to get through. Seconds can be critical in many emergency situations. The institution of 311 would help alleviate the part of the 911 system overburdened by the volume of non-emergency calls.

The Sacramento area is not unique in its sharing of law enforcement responsibilities between the County and the City. The emergency dispatch system is integrated for 911 calls and the dispatcher can tell with the non-cellular call whether the event occurred on the Sacramento County side of a particular street or the City of Sacramento side. As you can see from the attached map of Sacramento, the county and city are not cleanly or obviously divided by geographic clues, indeed the City at certain points seems to contain parts of the County. There are streets that alternate from being in the City to the County and then back in the City within less than one-third mile. The well meaning citizen reporting a non-emergency would need to remember to call (916) 440-5115 for the Sheriff if in the county or (916) 264-5471 for the City Police. These non-emergency numbers are not easy to remember nor to convert into acronyms. If you can not remember the number and dial 411 you need to know if you are in the City or the County to get the proper non-emergency number. In this area there are several different jurisdictions in or adjacent to Sacramento County, each with their own non-emergency number.⁴

² Articles entitled "Non-emergencies crowd 911 system" and "Cellular technology creates problems for CHP 911 centers" by Janine DeFao, staff writer for the Sacramento Bee, published in the Sacramento Bee, Sunday, September 15, 1996 were referred to extensively for the creation of these comments.

³ 911 should be used to report true emergencies which are those that would save a life, stop a crime in progress or report a fire.


⁴ There are the following "local" non-emergency numbers for this area: City of West Sacramento Police (916) 375-6474, Yolo County Sheriff's Department (916) 666-2411, El Dorado County Sheriff's Department (916) 621-6600, the Placer County Sheriff's Department (916) 889-7800.

Unfortunately, 911 becomes the easiest and most direct way to report a non-emergency. Since 911 dispatchers get the address of the caller on their screens they know which jurisdiction the caller is in (unless the call is from a cellular phone) and can give the caller the correct non-emergency listing or can tell them which number to request when calling 411.

The California Highway Patrol (CHP) fields all the 911 calls made on cellular phones in the state of California whether from a car or not. The explosion in the wireless telephone industry has lead to the astronomical increase in the calls to the CHP.⁵ In California there were over 94,000 cellular 911 calls in 1986 which increased to over 2.1 million cellular 911 calls in 1995. The total percentage increase in cellular 911 calls to the CHP during this period was over 2,000%. By diverting the non-emergency calls, the proposed 311 non-emergency number will help to alleviate some of the volume of 911 calls made on wireless telephones.

In conclusion, it is in the public interest for the Federal Communications Commission to adopt 311 as a national community policing number. Such a decision by this Commission will: (1) promote the public safety by reducing the burden on the 911 dispatchers who are in time-critical life-saving situations and who now handle too many non-emergency calls; and (2) promote the public health by reducing delays in 911 call response time to those in need of emergency medical, fire or police services. The Justice Department should be commended for its work in this area and the FCC should adopt 311 as the national community policing number as soon as possible.

Respectfully Submitted:



Janice F. Hill
Sacramento, California
October 9, 1996

These comments have been reviewed and endorsed by the following:

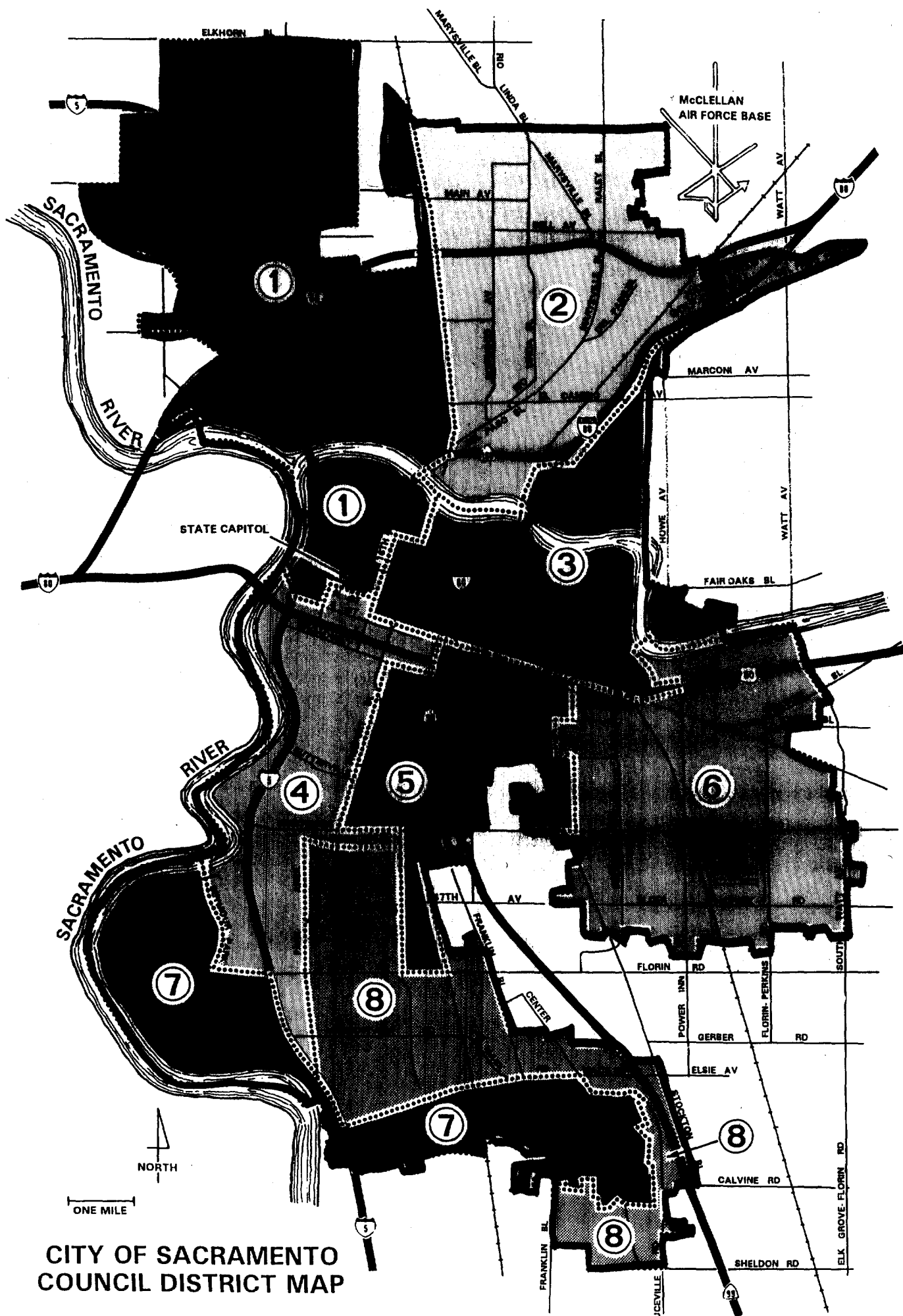
City of Sacramento

Attached statement of Councilmember Robbie Waters

Attached statement of Deputy City Manager Jack Crist

Separate statement of Arturo Venegas, Jr. Chief of Police

⁵ To make our list of non-memorable, non-emergency numbers complete, the non-emergency number for the California Highway Patrol is 445-2211.





OFFICE OF THE
CITY COUNCIL

ROBBIE WATERS

COUNCILMEMBER
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October 8, 1996

Regina Kenney, Chief
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Dear Ms. Kenney:

The purpose of this letter is to lend my support to the new "311" non-emergency telephone number project under consideration by your commission.

The City of Sacramento, similar to other cities nationwide, is experiencing a crisis in the communications arena due to the increasing volume of 911 telephone calls and the voluminous increase in non-emergency calls to 911 that serve only to tie up the 911 lines and dispatchers. An alternative number to handle non-life threatening problems and the other sometimes mis-directed calls that currently go to 911, would be greatly beneficial in increasing the efficiency of the 911 system as they respond to calls from city residents.

Please be advised of our interest in this project and add us to any communications roster you might have on this topic. My office may be reached at (916) 264-7338. Thank you for your consideration.

Sincerely,


ROBBIE WATERS
COUNCILMEMBER, DISTRICT SEVEN

RW:lab:b:D78

c: Jack Crist, Deputy City Manager
Arturo Venegas Jr., Chief, Sacramento Police Department



OFFICE OF THE
CITY MANAGER

CITY OF SACRAMENTO
CALIFORNIA

October 7, 1996

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Federal Communications Commission
Attn: Secretary to the FCC
1919 M St. N.W.
Washington, DC

SUBJECT: NEW "311" NON EMERGENCY POLICE PHONE SYSTEM

Please be advised that the City of Sacramento would greatly benefit from a new "311" non emergency Police phone system currently being discussed before your Commission. The City's emergency 911 phone system currently receives a very high level of non emergency calls which simply tie up the emergency system and on occasion, delay response to legitimate emergency calls for service.

The problem is rapidly becoming more serious as cellular phones gain acceptance. For example, a single automobile accident on a Sacramento freeway can result in literally hundreds of phone calls as each passing car attempts to report the incident. The result is a 911 busy signal for other emergency callers. A "311" alternative number would greatly assist local emergency dispatch professionals as they attempt to deal with this growing communications crisis.

The concept of a national number for non emergency calls which would provide callers with an alternative to 911 would greatly relieve the growing burden of the existing system. The City of Sacramento endorses and supports the "311" phone number reservation in order to preserve future options in this regard. We also endorse the position paper of Ms. Jan Hill, Sacramento, California.

JACK CRIST
Deputy City Manager



DEPARTMENT OF
POLICE

ARTURO VENEZAS, JR.
CHIEF OF POLICE

CITY OF SACRAMENTO
CALIFORNIA

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October 8, 1996

Ref 10-8

Secretary, FCC
Federal Communications Commission
1919 M Street, NW
Washington, D.C.

Dear Secretary,

Please be advised that the City of Sacramento would greatly benefit from a new "311" non-emergency Police phone system currently being discussed before your commission. The City's emergency 911 phone system currently receives a very high level of non-emergency calls which simply tie up the emergency system and on occasion, delay response to legitimate emergency calls for service.

This problem is rapidly becoming more serious as cellular phones gain acceptance. For example, a single automobile accident on a Sacramento freeway can result in literally hundreds of phone calls as each passing car attempts to report the incident. The result is a 911 busy signal for other emergency callers. A "311" alternative number would greatly assist local emergency dispatch professionals as they attempt to deal with this growing communication crisis.

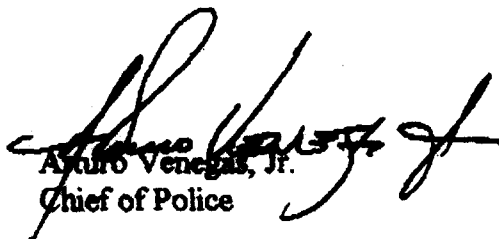
Letter to FCC, Secretary

Page 2

October 8, 1996

The concept of a national number for non-emergency calls which would provide callers with an alternative to 911 would greatly relieve the growing burden of the existing system. Additionally, such a system would provide greater customer service as citizens who cross jurisdictions could call the same number regardless if they were in Sacramento, Chicago, or New York. This model has a proven success record with 911. The City of Sacramento strongly endorses this effort.

Sincerely,



Arturo Venegas, Jr.
Chief of Police

AV:mp

cc: Jack Crist